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13 POLICE DEPARTMENT OF THE CITY OF BURBANK (erroneously sued as an  
independent entity named "BURBANK POLICE DEPARTMENT")

14 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
15 **FOR THE COUNTY OF LOS ANGELES**

16 OMAR RODRIGUEZ; CINDY  
17 KARAGIOSIAN-GOMEZ; STEVE  
18 KARAGIOSIAN; ELFEGO RODRIGUEZ;  
AND JAMAL CHILDS,

19 Plaintiffs,

20 v.

21 BURBANK POLICE DEPARTMENT; CITY  
OF BURBANK; AND DOES 1 THROUGH  
100, INCLUSIVE,

22 Defendants.

23 AND RELATED CROSS-ACTIONS  
24  
25  
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Case No. BC 414602

Date: June 8, 2011

Time: 9:00 a.m.

Location: 37

Judge: The Honorable Joanne O'Donnell

**DEFENDANT CITY OF BURBANK'S  
[PROPOSED] SPECIAL VERDICT FORM  
RE: PLAINTIFF KARAGIOSIAN**

File Date: May 28, 2009

Trial Date: June 8, 2011 (Plff. Karagiosian);

July 27, 2011 (Plff. O. Rodriguez)

Discovery Referee: Hon. Diane Wayne, Ret.

1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 Defendant CITY OF BURBANK hereby submits the following proposed special verdict,  
3 which is CACI VF-2506A modified to apply to the facts and causes of action in this case.  
4

5 Dated: May 6, 2011

BALLARD, ROSENBERG, GOLPER &  
SAVITT LLP  
Linda Miller Savitt

6  
7 By: Linda Miller Savitt  
8 Linda Miller Savitt  
9 Attorneys for Defendants and  
10 Cross-Complainant CITY OF BURBANK,  
11 including the POLICE DEPARTMENT OF  
12 THE CITY OF BURBANK (erroneously  
13 sued as an independent entity named  
14 "BURBANK POLICE DEPARTMENT")  
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**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES**

STEVE KARAGIOSIAN,

Plaintiff,

v.

BURBANK POLICE DEPARTMENT; CITY  
OF BURBANK; AND DOES 1 THROUGH  
100, INCLUSIVE,

Defendants.

Case No. BC 414602

**SPECIAL VERDICT**

Trial Date: June 8, 2011

1 We, the jury in the above-entitled action, find the following special verdict on the issues  
2 submitted to us as to the claims brought by Plaintiff STEVE KARAGIOSIAN against Defendant  
3 CITY OF BURBANK:

4 **Hostile Work Environment**

- 5  
6 1. Was Steve Karagiosian subjected to unwanted harassing conduct because he is  
Armenian?

7 ☐ Yes ☐ No

8 If your answer to question 1 is yes, then answer question 2. If you answered no,  
9 stop here, answer no further questions, and have the presiding juror sign and date  
this form.

- 10 2. Was the harassment severe or pervasive?

11 ☐ Yes ☐ No

12 If your answer to question 2 is yes, then answer question 3. If you answered no,  
13 stop here, answer no further questions, and have the presiding juror sign and date  
this form.

- 14 3. Would a reasonable person in Steve Karagiosian's circumstances have considered  
15 the work environment to be hostile or abusive?

16 ☐ Yes ☐ No

17 If your answer to question 3 is yes, then answer question 4. If you answered no,  
18 stop here, answer no further questions, and have the presiding juror sign and date  
this form.

- 19 4. Did Steve Karagiosian consider the work environment to be hostile or abusive?

20 ☐ Yes ☐ No

21 If your answer to question 4 is yes, then answer question 5. If you answered no,  
22 stop here, answer no further questions, and have the presiding juror sign and date  
this form.

- 23 5. Did the City of Burbank know or should have known of the harassing conduct?

24 ☐ Yes ☐ No

25 If your answer to question 5 is yes, then answer question 6. If you answered no,  
26 stop here, answer no further questions, and have the presiding juror sign and date  
27 this form.

6. Did the City of Burbank fail to take immediate and appropriate corrective action?

\_\_\_\_\_ Yes \_\_\_\_\_ No

If your answer to question 6 is yes, then answer question 7. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

7. Did Steve Karagiosian prove by a preponderance of the evidence that the harassing conduct was a substantial factor in causing harm to him?

Yes \_\_\_\_\_ No \_\_\_\_\_

If your answer to question 7 is yes, then answer question 8. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

8. What are Steve Karagiosian's damages?

Past non-economic loss: \_\_\_\_\_

Future non-economic loss:

Total non-economic loss:

**TOTAL:**

Please sign and date this form.

Signed: \_\_\_\_\_  
Presiding Juror

Dated: